

# **EXHIBIT B**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

RICHARD DASCHBACH and ELCINDA  
PERSON, individually and on behalf of all  
others similarly situated,

*Plaintiffs,*

v.

PMC HOME & AUTO INSURANCE  
AGENCY, LLC d/b/a PROTECT MY CAR a  
Florida limited liability company,

*Defendant.*

Case No. 1:20-cv-00706-JL

**DECLARATION OF ELCINDA PERSON**

I, Elcinda Person, declare the following under penalty of perjury:

1. I am an adult over 18 years of age.
2. I have personal knowledge of the facts set forth herein. I could and would testify to them if called upon to do so.
3. I am one of the named plaintiffs in the above-captioned matter.
4. I understand that the defendant claims that I visited a website at the address [www.retailproductzone.com](http://www.retailproductzone.com). I have never visited this website, nor have I ever authorized another person to visit it on my behalf.
5. I likewise never provide any personal information or consent to Defendant prior to this action, and I never provided such information or consent to [www.retailproductzone.com](http://www.retailproductzone.com).
6. Not only did I not visit this website, I rarely use the internet whatsoever.
7. I only own one internet connective device (my phone) and never use my phone to access the internet.

Respectfully submitted,

Dated: 09-29-2020

Elcinda Person

